

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

**IN RE:
VINROY W. REID**

Case No. 18-31436

Chapter 13

Debtor(s)

MOTION TO SUBSTITUTE COUNSEL

NOW COMES THE DEBTOR by and through attorney, Robert Lewis, Jr., and moves to substitute Robert Lewis, Jr., as the attorney of record in this Bankruptcy proceeding. In support hereof, Debtor shows unto the Court.

1. The Debtor filed a voluntary petition for relief under chapter 11 of the United States Bankruptcy Code in this Court on September 21, 2018 (the "Petition Date").
2. Debtor's original attorney of record R. Keith Johnson was allowed to withdraw on April 12, 2019.
3. Debtor desires to to employ the legal services of attorney, Robert Lewis, Jr., to be henceforth his attorney of record in this bankruptcy proceeding.
4. The undersigned is informed and believes that Debtor has communicated with Mr. Johnson about its intention to change legal counsel as above set-forth.
5. Attorney Robert Lewis, Jr., is a licensed practicing attorney, admitted to and engaged in the practice of law in this Court; he represents no interests in conflict with the interests of Debtor, either in this proceeding or generally.

WHEREFORE, DEBTOR PRAYS THE COURT:

1. Authorize and approve the substitution of Robert Lewis, Jr., as legal counsel in this bankruptcy proceeding; and in connection therewith; authorize Attorney Robert Lewis, Jr., to assume the responsibilities as Debtor's legal counsel of record; and
2. for such other and further relief as to the Court may deem just and proper.

This 26th day of April, 2019.

/s/ Robert Lewis, Jr. (NC Bar No. 35806)
The Lewis Law Firm, P.A.
434 Fayetteville Street, Suite 2330
Raleigh, NC 27601
Phone: (919) 719-3906
Fax: (919) 573-9161
Email: rlewis@thelewislawfirm.com

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**NOTICE OF OPPORTUNITY FOR HEARING
(Response required if opposed and hearing sought)**

TAKE NOTICE that Debtor(s) has filed papers with the Court to substitute counsel. A copy of these papers is included with this Notice.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

If you do not want the Court to order the substitution of counsel, or if you want the Court to consider your views on the motion, then on or before May 12, 2019, you or your attorney must do three (3) things:

File with the Court a written response requesting that the Court hold a hearing and explaining your position. File the response at:

U.S. Bankruptcy Court 401 W. Trade Street Charlotte, NC 28202

If you mail your request to the Court for filing, you must mail it early enough so that the Court will receive it on or before the date stated above.

On or before the date stated above for written responses, you must also mail or fax a copy of your written request to:

Robert Lewis, Jr
PO Box 1446
Raleigh, NC 27602

Attend the hearing scheduled for: May 14, 2019, at the United States Bankruptcy Court, 401 W. Trade Street, Courtroom# 1-5, Charlotte, North Carolina 28202.

If you or your attorney do not take these steps, A HEARING WILL NOT BE HELD, and the Court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

This 26th day of April, 2019.

/s/ Robert Lewis, Jr. (NC Bar No. 35806)
The Lewis Law Firm, P.A.
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Raleigh, NC 27601
Phone: (919) 719-3906
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The undersigned certifies that on the 26th day of April, 2019, he served a copy of the foregoing: MOTION TO SUBSTITUTE LEGAL COUNSEL and NOTICE OF OPPORTUNITY FOR HEARING:

by placing said copy in a postpaid envelope addressed to the person(s) hereinafter named, at the place address below, which is the last known address, and by depositing said envelope and its contents in the United States Mail or via electronic filing:

Bankruptcy Administrator (via ECF)

Chapter 13 Trustee (via ECF)

Vinroy W. Reid (sent via electronic filing)
PO Box 5035
Charlotte, North Carolina 28229

ALL CREDITORS ON MATRIX

This 26th day of April, 2019.

/s/ Robert Lewis, Jr. (NC Bar No. 35806)
The Lewis Law Firm, P.A.
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Raleigh, NC 27601
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